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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

JOEL EICHENHOLTZ, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

VERIFONE HOLDINGS, INC., DOUGLAS G.  
BERGERON, and BARRY ZWARENSTEIN,

Defendants.

No. C 07-6140 MHP

CLASS ACTION

DECLARATION OF ALAN R. PLUTZIK  
IN SUPPORT OF THE MOTION OF THE  
ARKANSAS PUBLIC EMPLOYEES'  
RETIREMENT SYSTEM FOR  
CONSOLIDATION, APPOINTMENT AS  
LEAD PLAINTIFF, AND APPROVAL OF  
SELECTION OF LEAD AND LOCAL  
COUNSEL

DATE: March 17, 2008

TIME: 2:00 p.m.

COURTROOM: 15

JUDGE: Hon. Marilyn H. Patel

[Captions Continued on Next Page]

MOTION OF THE ARKANSAS PUBLIC EMPLOYEES' RETIREMENT SYSTEM FOR  
CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF, AND APPROVAL OF SELECTION  
OF LEAD AND LOCAL COUNSEL  
CASE NO. C 07-06140-MHP

PETER LIEN, Individually and On Behalf of All  
Others Similarly Situated,

Plaintiff,

v.

VERIFONE HOLDINGS, INC., DOUGLAS G.  
BERGERON, and BARRY ZWARENSTEIN,

Defendants.

No. C 07-6195 JSW

CLASS ACTION

DONALD CERINI, Individually and On Behalf  
of All Others Similarly Situated,

Plaintiff,

v.

VERIFONE HOLDINGS, INC., DOUGLAS G.  
BERGERON, and BARRY ZWARENSTEIN,

Defendants.

No. C 07-6228 SC

CLASS ACTION

BRIAN VAUGHN, Individually and On Behalf  
of All Others Similarly Situated,

Plaintiff,

v.

VERIFONE HOLDINGS, INC., DOUGLAS G.  
BERGERON, and BARRY ZWARENSTEIN,

Defendants.

No. C 07-6197 VRW

CLASS ACTION

[Captions Continued on Next Page]

DECLARATION OF ALAN R. PLUTZIK IN SUPPORT OF THE MOTION OF THE  
ARKANSAS PUBLIC EMPLOYEES' RETIREMENT SYSTEM FOR CONSOLIDATION,  
APPOINTMENT AS LEAD PLAINTIFF, AND APPROVAL OF SELECTION OF LEAD COUNSEL AND  
LIAISON COUNSEL  
CASE NO. C 07-06140-MHP

ALBERT L. FELDMAN and ELENOR JEAN  
FELDMAN, Individually and On Behalf of All  
Others Similarly Situated,

Plaintiffs,

v.

VERIFONE HOLDINGS, INC., DOUGLAS G.  
BERGERON, and BARRY ZWARENSTEIN,

Defendants.

No. C 07-6128 MMC

CLASS ACTION

WESTEND CAPITAL MANAGEMENT LLC,  
Individually and On Behalf of All Others  
Similarly Situated,

Plaintiff,

v.

VERIFONE HOLDINGS, INC., DOUGLAS G.  
BERGERON, and BARRY ZWARENSTEIN,

Defendants.

No. C 07-6237 MMC

CLASS ACTION

KURT HILL, on behalf of himself and all others  
similarly situated,

Plaintiff,

v.

VERIFONE HOLDINGS, INC., DOUGLAS G.  
BERGERON, and BARRY ZWARENSTEIN,

Defendants.

No. C 07-6238 MHP

CLASS ACTION

[Captions Continued on Next Page]

DECLARATION OF ALAN R. PLUTZIK IN SUPPORT OF THE MOTION OF THE  
ARKANSAS PUBLIC EMPLOYEES' RETIREMENT SYSTEM FOR CONSOLIDATION,  
APPOINTMENT AS LEAD PLAINTIFF, AND APPROVAL OF SELECTION OF LEAD COUNSEL AND  
LIAISON COUNSEL  
CASE NO. C 07-06140-MHP

DANIEL OFFUTT, Individually and On Behalf  
of All Others Similarly Situated,

Plaintiff,

v.

VERIFONE HOLDINGS, INC., DOUGLAS G.  
BERGERON, and BARRY ZWARENSTEIN,

Defendants.

No. C 07-6241 JSW

CLASS ACTION

EDWARD FEITEL, on behalf of himself and all  
others similarly situated,

Plaintiff,

v.

VERIFONE HOLDINGS, INC., DOUGLAS G.  
BERGERON, and BARRY ZWARENSTEIN,

Defendants.

No. C 08-0118 CW

CLASS ACTION

DECLARATION OF ALAN R. PLUTZIK IN SUPPORT OF THE MOTION OF THE  
ARKANSAS PUBLIC EMPLOYEES' RETIREMENT SYSTEM FOR CONSOLIDATION,  
APPOINTMENT AS LEAD PLAINTIFF, AND APPROVAL OF SELECTION OF LEAD COUNSEL AND  
LIAISON COUNSEL  
CASE NO. C 07-06140-MHP

1 I, Alan R. Plutzik, declare as follows:

2 I am an attorney duly licensed to practice law in the State of California. I am an attorney  
3 with the law firm of Schiffrin Barroway Topaz & Kessler, LLP. I respectfully submit this  
4 declaration in support of the Motion of The Arkansas Public Employees' Retirement System For  
5 Consolidation, Appointment as Lead Plaintiff, And Approval of Selection of Lead And Local  
6 Counsel. I have personal knowledge of the facts stated herein and, if called as a witness, I could  
7 and would testify competently thereto.

8 1. Attached hereto as Exhibit A is a true and correct copy of the Certification of Gail  
9 H. Stone, Executive Director of the Arkansas Public Employees Retirement System.

10 I declare under the penalty of perjury that the foregoing is true and correct. Executed this  
11 4th day of February, 2008, at Walnut Creek California.

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13 /s Alan R. Plutzik  
14 ALAN R. PLUTZIK  
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# **EXHIBIT A**

### CERTIFICATION

I, GAIL H. STONE, Executive Director of Arkansas Public Employees Retirement System ("APERS"), hereby states that:

1. I have reviewed a complaint containing certain factual allegations regarding VeriFone Holdings, Inc.'s ("VeriFone") anticipated restatement of earnings. APERS adopts the factual allegations in the complaint. However, APERS contends that the class period should be August 31, 2006 to December 3, 2007, and reserves the right to seek to modify this period as necessary.

2. On behalf of APERS, I authorize the law firms of Nix, Patterson & Roach, L.L.P. to serve as APERS' lead counsel and Keil & Goodson, L.L.P. to serve as APERS' additional counsel in this matter. On behalf of APERS, I authorize these law firms to represent the interests of APERS in this matter.

2. APERS did not purchase any securities of VeriFone at the direction of counsel or in order to participate in this private action.

3. APERS is willing to serve as a representative party on behalf of a class, including providing testimony at deposition and trial, if necessary.

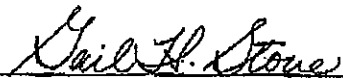
4. All of the transactions of APERS in the securities of VeriFone during the class period specified in the Complaint are attached hereto as Schedule "A."

5. APERS has sought to serve as a representative party on behalf of a class under the federal securities laws twice during the last three years, in *In re Brocade Securities Litigation*, No. 3:05-cv-2042 (N.D. Cal.), and *Kim v. Harman Int'l Indus., Inc.*, No. 07-1757 (D.D.C.). APERS is currently a class representative in *In re Brocade Securities Litigation*; appointment of a representative party in *Kim v. Harman Int'l Indus., Inc.* remains pending.

6. APERS will not accept any payment for serving as a representative party on behalf of a class except to receive its pro rata share of any recovery, or as ordered or approved by the Court, including the award to a representative party of reasonable costs and expenses relating to the representation of the class.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this the 4th day of February, 2008.

  
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Gail H. Stone  
Executive Director  
ARKANSAS PUBLIC  
EMPLOYEES RETIREMENT  
SYSTEM



**Arkansas Public Employees' Retirement System****SCHEDULE A**

<b>Date</b>	<b>Purchase or Sale</b>	<b>Type of Securities</b>	<b>Number of Securities</b>	<b>Price of Securities</b>
9/26/07	Purchase	Com Stk	2,300	42.0700
10/19/07	Purchase	Com Stk	600	43.9800
12/4/07	Sale	Com Stk	2,900	26.0200
10/22/07	Purchase	1.375 15JUN2012 Bond	975,000	118.0600
11/6/07	Purchase	1.375 15JUN2012 Bond	370,000	123.9900
11/21/07	Purchase	1.375 15JUN2012 Bond	560,000	118.5900
12/3/07	Sale	1.375 15JUN2012 Bond	955,000	89.8300
12/4/07	Sale	1.375 15JUN2012 Bond	950,000	88.9100